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8 UNITED STATES DISTRICT COURT
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10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,

13 Case No. CR 16-00440 WHA

14 Plaintiff,

15 **SUPPLEMENTAL DECLARATION OF
16 GANESH KRISHNAN REGARDING
17 MOTION TO MODIFY TRIAL
18 SUBPOENA**

v.

19 YEVGENIY ALEKSANDROVICH
20 NIKULIN,

21 Judge: Hon. William H. Alsup

22 Defendant.

23 Date Filed: October 4, 2016

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1 I, Ganesh Krishnan, declare:

2 1. I am a former employee of LinkedIn Corporation and the government has
3 subpoenaed me to serve as a trial witness in this matter. I have knowledge of the facts set forth
4 herein, and if called upon as a witness, I could testify to them competently under oath.

5 2. Due to my pre-existing health condition, I continue to have significant concerns
6 regarding testifying in person at Mr. Nikulin's trial while shelter orders remain in place
7 throughout the Bay Area as a result of the COVID-19 pandemic. However, assuming the trial
8 proceeds as currently scheduled on June 8, I am willing to withdraw my motion to modify the
9 trial subpoena and will voluntarily agree to testify in person if the Court takes precautions to
10 ensure the safety of all trial participants and my testimony can be completed in one day to avoid
11 increasing my risk of contagion by traveling to and from the courthouse multiple times.

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13 Executed on May 28, 2020, in Fremont, California.

14 I declare under penalty of perjury that the foregoing is true and correct.

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Ganesh Krishnan

GANESH KRISHNAN